

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
DANTE A. DIFRONZO,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	21-10867-FDS
CITY OF SOMERVILLE, et al.,)	
)	
Defendants.)	
_____)	

AMENDED JURY VERDICT FORM

Questions as to Liability

Note: As to questions 1 through 10, mark an "X" in the appropriate place:

COUNT 1 – FIRST AMENDMENT RETALIATION

1. [deleted]
2. On plaintiff's claim against Joseph Curtatone for retaliation for the exercise of his First Amendment rights (Count 1), we find in favor of:

☒ Plaintiff

☐ Defendant Joseph Curtatone
3. On plaintiff's claim against David Fallon for retaliation for the exercise of his First Amendment rights (Count 1), we find in favor of:

☒ Plaintiff

☐ Defendant David Fallon
4. On plaintiff's claim against Bernard Cotter for retaliation for the exercise of his First Amendment rights (Count 1), we find in favor of:

☒ Plaintiff

☐ Defendant Bernard Cotter

COUNT 2 – TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONSHIP

5. On plaintiff's claim against Joseph Curtatone for tortious interference with a contractual relationship (Count 2), we find in favor of:

_____ Plaintiff

✓ Defendant Joseph Curtatone

6. On plaintiff's claim against David Fallon for tortious interference with a contractual relationship (Count 2), we find in favor of:

_____ Plaintiff

✓ Defendant David Fallon

7. On plaintiff's claim against Bernard Cotter for tortious interference with a contractual relationship (Count 2), we find in favor of:

_____ Plaintiff

✓ Defendant Bernard Cotter

COUNT 3 – TORTIOUS INTERFERENCE WITH ADVANTAGEOUS RELATIONSHIP

8. On plaintiff's claim against Joseph Curtatone for tortious interference with an advantageous relationship (Count 3), we find in favor of:

✓ Plaintiff

_____ Defendant Joseph Curtatone

9. On plaintiff's claim against David Fallon for tortious interference with an advantageous relationship (Count 3), we find in favor of:

✓ Plaintiff

_____ Defendant David Fallon

10. On plaintiff's claim against Bernard Cotter for tortious interference with an advantageous relationship (Count 3), we find in favor of:

✓ Plaintiff

_____ Defendant Bernard Cotter

Note: If you answered every question 1 through 10 in favor of defendants, you do not need to answer any of the remaining questions. Have your foreperson sign and date this form, because you have completed your deliberations. Otherwise, proceed to the next set of questions.

Question as to Compensatory Damages

Note: Answer question 11 only if you found in favor of plaintiff on any of questions 1 through 10.

11. Compensatory damages: We award compensatory damages to the plaintiff in the following amounts:

a. For lost compensation before July 2021:

\$ none (stating the amount or, if none, write the word "none").

b. For lost compensation after July 2021:

\$ 200,000.00 (stating the amount or, if none, write the word "none").

c. For emotional distress before July 2021:

\$ 300,000.00 (stating the amount or, if none, write the word "none").

d. For emotional distress after July 2021:

\$ 300,000.00 (stating the amount or, if none, write the word "none").

Question as to Punitive Damages

Note: Answer question 12 only if you found in favor of plaintiff on any question 1 through 4.

12. Punitive damages for First Amendment retaliation: We award punitive damages to the plaintiff in the following amount:

\$ none (stating the amount or, if none, write the word "none").

Question as to Pre-Judgment Interest

Note: Answer question 13 ***only*** if you found damages for plaintiff on question 11. If you found any defendant liable on questions 5 through 10 ***and*** you found damages for plaintiff on question 11, you must check "Yes."

13. Pre-judgment interest: We award the plaintiff pre-judgment interest on his compensatory damages:

✓ Yes

 No

Your deliberations are complete. Please sign and date this form, and notify the court officer.

Karen Ross
Foreperson

10/23/2024
Date